

From: Snyder, David [<mailto:dsnyder@aiadc.org>]
Sent: Sunday, May 30, 2010 8:04 AM
To: Sells, Todd, NAIC
Subject: FW: AIA Comments to Latest Exposure Draft

Dear Todd,

Below are comments submitted by AIA regarding the business to be included, by our request to delete Columns 5 and 7, or by an alternative which we provided regarding Section 6. We wish to reiterate and resubmit the substance of these comments to the NAIC in connection with the latest exposure draft. Could you indicate by return email that you have received this request?

Also, could you indicate what the next steps will be for this initiative?

Thank you and all the best.

Sincerely,

David F. Snyder

From: Snyder, David
Sent: Mon 5/17/2010 1:39 PM
To: 'tsells@naic.org'
Subject: AIA Comments

Dear Todd,

The American Insurance Association wishes to make the following comments on Health Reform Blanks Proposal exposure May12.doc:

We request that Column 5 (Other Business) and Column 7 (Other Health) be deleted from this proposed blank. The purpose of the blank is to facilitate computation of the Medical Loss Ratio under newly enacted Section 2718 of the PHSA. Columns 5 and 7 represent business that is not subject to Section 2718 of the PHSA and should therefore be deleted.

The proposed blanks requires the compilation and categorization of significant data that offers no regulatory value other than for the purpose of standardizing the computation of the medical loss ratio of products subject to Section 2718. We can see no reason that insurers should be expected to divert resources and incur additional expense for the development and reporting of complex data for which there is no regulatory requirement.

The most direct means of targeting the proposed blank to business subject to Section 2718 is through the deletion of columns 5&7. As an alternative, columns 5&7 could be deleted and instructions for Section 6 developed stating:

"Column 6 Other All other health care business not reported in columns 1 through 4 but specified by regulations promulgated by HHS, in consultation with the NAIC, as subject to the medical loss ratio requirement of Section 2718 of the PHSA."

Thank you.

Sincerely,

David F. Snyder,
Vice President and
Associate General Counsel